

NARRATIVE

On Thursday, February 25, 1988, this author investigated the circumstances of a rejected shipment of special waste (nonhazardous) that was manifested for disposal from Sherex to Peoria Disposal.

The shipment consisted of 48 drums of waste. The manifest (IL #1787741) indicated that the 48 drums were blasting sand. According to Peoria City/County, after examining the 48 drums, 43 of the drums contained blasting sand. The remaining 5 drums contained an unknown liquid. One (1) of the five (5) drums registered a pH of 10 on the meter and a field pH of 13. Peoria City/County reported to the Agency that some liquid spilled out of this drum. Reportedly, about 1 gallon spilled out. The area was excavated and 12 drums were collected from the excavated area. A total of 12 drums of excavated soil and the 5 drums of unknown liquid were returned to Sherex.

This author arrived at Sherex at 6 p.m. (on 2/25/88) to sample the 5 drums of waste in question. There was about a 15 to 20 minute delay because Harry Mervis, plant supervisor, had to be contacted at home by security. (Mr. Mervis requested that this author wait until he arrived before going on site.) Mr. Mervis accompanied this author to the warehouse building where the drums (17) were stored.

While at the warehouse, this author observed 5 drums of material bearing a label which read sand blasting sand. Twelve (12) fairly new drums had no labels on them. All 17 drums were opened by a Sherex employee. At that time, only 3 of the 5 drums in question contained liquid. It appears that the liquid in the other 2 drums were absorbed by the material (possibly sand) in the drums. The 3 drums were labeled X001, X002, and X003 and sampled with glass rods. Prior to sampling each drum, a field pH was taken. The pH's are as follows:

<u>Drum</u>	<u>Field pH</u>
X001	7
X002	11
X003	13

After the above samples were taken, they were sealed and returned to the Peoria office for evidence. This author left the site at 8 p.m.

Based on the above investigation, the following apparent violations of 35 Ill. Adm. Code, Subtitle G were observed:

Section 722.111 - This facility failed to make the proper waste determination pursuant to this section for their blasting sand.

Section 809.301 - This facility manifested special waste to a special waste hauler on a manifest not completed in accordance with Subpart E of this Part.

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Section 809.302 - This facility offered special waste to a facility that does not have the necessary supplemental permits required by 35 Ill. Adm. Code 807.

Section 809.501 - This facility manifested special waste (hazardous) to a non-permitted site (Peoria City/County Landfill).

Section 855.104 - This facility manifested a shipment of special waste on a manifest that did not contain the proper authorization number.

On Friday, February 26, 1988, this author interviewed Dale Kumpf, administration manager, and Serin Rao, plant environmental engineer, about the rejected shipment of special waste manifested to Peoria Disposal.

According to Dale Kumpf, Sherex thinks the waste in question is a corrosive amine. Mr. Kumpf said Sherex thinks the waste was inadvertently placed with the blasting sand and ultimately manifested as such.

Sherex told this author that samples of the three drums of waste were taken to be analyzed at the facility's laboratory. According to Mr. Kumpf, the waste was analyzed to confirm the identity of the waste. The results of the analyses are expected on Tuesday, March 1, 1988, according to Sherex's senior chemist. If Sherex's samples test nonhazardous, the Agency may run its samples for confirmation.

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DATE: November 7, 1986

TO: Division File

FROM: Monte Nienkerk *Monte M. Nienkerk*

SUBJECT: 1438050006 -- Peoria County
Sherex Chemical Company
Superfund/General Correspondence

On October 31, 1986 at 9:00 A.M., I interviewed Mr. Packey Rush. This interview concerned his past activities at the subject facility. Mr. Rush is currently working for the Illinois Department of Transportation in Springfield. His residence is at 211 Arrow, Pekin, Illinois 61554. His home phone number is 309/346-1389. His business phone number is 217/785-2426.

I explained my purpose for interviewing Mr. Rush. I indicated that this was all being done in cooperation with Sherex Chemical and Ashland Chemical. I also informed him of the September 24th interviews with present and past employees. I showed him the list of people that we interviewed.

Mr. Rush worked at the plant from April 1962 to April 1976. He was there during the time that ADM and Ashland operated the plant. He could not remember the specific time when the plant changed hands from ADM to Ashland.

His duties included the handling of hazardous materials for the plant. He worked in an area referred to as the hazardous materials bulk facility. I showed him one of the drawings provided by Sherex (No. 393-01-G-48, dated 4/19/83) that shows the plant layout. Mr. Rush indicated where the hazardous materials bulk facility is located. He stated that they handled many more hazardous materials than those shown on the drawing. Some of these additional materials included xylene, hydrogen peroxide, heptane, propane, and isopropanol.

I explained to Mr. Rush that I was talking to him because his name was given to us as a person that might have been involved with using the pitch wagon to haul waste from the HPA reactor. Mr. Rush indicated that, although he knew of the existence of the HPA reactor, he did not know that the pitch wagon was used to haul waste from the reactor. He had no knowledge of the cleaning of the reactor or the disposal of the waste from the reactor.

Mr. Rush did give me the names of two employees that are still working at Sherex and may have further information. Lyle Cremeens works in the 02 building (this is the building where the HPA reactor is located). He has worked there since the beginning of the facility. Jim Lamb was responsible for operating the pitch wagon.

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